

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

FLOYD L. SEMONS,  
v. Plaintiff,

CASE NO. 22-CV-594

J. TAULBUT, R. FRYE,  
And KAYLA, Defendant,

Motion To Amend Complaint

I'm Plaintiff Floyd Semons pro se file Motion  
To Amend Complaint Civil Procedure 15 Explained  
and Rule 15 Federal Rule of civil Procedure as  
Followings;

Amend Complaint

I. Plaintiff Respectfully Require the two Maintenance  
Defendants Be Add with following support, due to  
Court Error mistake Documents, and Complaint.  
There were Affidavits Exhibit 004 reply on The Court  
enlighten.

II, Defendant Taulbut informed HISU staff March, 30, 2022  
John Doe Maintenance staff Place "Paint over" Wet  
Plaster which Cause Multiple wholes in the walls as  
Damage wall Cause Repeatedly Crumbling Plaster to fall  
into the Living Area, Bed Area of the Cell. So HISU didn't  
Charge me Co-Pay \$7.50 due to indication.

III, Defendant Taulbut already Place a work order end  
Before Plaintiff were assigned to cell 8 on unit 10 at  
Dodge Correctional Institution. Meaning Before March, 28  
When Plaintiff was assigned, meaning Defendant  
Vicarious Liability as Both Maintenance workers  
Knew were aware of Dangerous Condition which  
Maintenance Have a Duty to Keep the Environment safe.  
The Eighth amendment is violated Even if a Plaintiff  
Face danger without Receive injuries.

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IV. Defendant R. Frye is the ~~Supervisor~~ Supervisor of Maintenance the one who Receive Officers work orders from units at DC3. He ~~is~~ is Liability under Violating Plaintiff Eighth amendment by Being aware of incident Before it Even took Place, C.O Taubbot Place Cord Board over the Bottom Bunk Area against the Cell Bunk in walls due to the Top and Bottom Bunk are connected to the walls, Also due to Taubbot were trying to Help the Crumbling Plaster from Reaching the Bottom Bunk Bed area at a Point Before Plaintiff was assigned to Cell 8.

V. Kayla Maintenance worker are to fix the wall or Any Damage if reported to R. Frye, On April, 1, 2022. John Doe Maintenance worker I Believe it were Defendant R. Frye Acknowledge the walls from the Cell door. In didnt seen Kayla to Fix it until April, 13, 2022. Kayla also informed witness Exhibit took Daishawn inmate another Maintenance worker Place ~~Paint~~ Paint over Wet Plaster in Cell 8 as He wasnt getting assigned to that Cell 8 under Her supervisor vision. Respectfully I dont Believe she ~~is~~ Liability under any Eighth amendment claim. I agree with Honorable Magistrate Judge William to dismiss This Defendant. Require Maintenance R. Frye to Stand Trial under Violating Plaintiff Eighth amendment Claim against Him.

VI. Defendant Maintenance R. Frye where aware of a injury may take Place By Knowing of Crumbling Plaster in some one that work for Him Place Paint over Wet Plaster causing serious Damage To the Cell walls, There For the Eighth amendment Deliberate indifferent Claim shall Be granted against  
2 of 3  
- R. Frye.

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Damage To Walls.

Sign / ~~Sancti Floyd~~  
Date 8-24-2022

VI, The Damage Require Multiple whole in the Walls. There are 4 Connected walls in each cell. The wall Towards the Rear of a cell Had Multiple wholes with crumbling Plaster ~~Reap~~ Repeatedly Falling on to the Bunk Area were inmates Have to sleep, which is Connected To the Bunks. The Damage that wall Had along were 9-10 wholes and the walls going Down the whole wall against the Top Bunk in Bottom Bunk area. wholes as 2-3 ~~inch~~ inches Some Even 4-6 inches Multiple little wholes like 30 or more very little wholes as well Surrounding the Bigger wholes with Plaster Falling.

VII, The wall To your Left which will Be Cell 8 Left Hand side wall which Have the Bunks ~~also~~ also Connected The wholes were 2-3 inches Even By The wall Towards the Cell Door Left Hand side that's Not Connected to the Bunk Area Had Bigger wholes 4-6 inches with Multiple wholes around them wholes. You can tell By Acknowledging them, The Paint were Wet when some one Paint it on the walls due to Lines were going throw the walls in some parts That ~~looked~~ Looked another whole in the wall were coming ~~from~~. The Plaster Fall on Plaintiff Face more then Once in feet, Connecting with Plaintiff eyes. Medical Records show Exhibit 011 Plaintiff right Eye Have 20/20 vision the injury Eye Left Have 20/30 vision with Corneal Abrasion with days of Eye Treatment For infection medicated Prescribed For days 4-5 suffering. Serious Damage For Life. Address Response Floyd Semons, #581602 GBLI TO: Clerk and Magistrate Judge And Defendant Atty.